



Procedure

RHI Data Sharing Procedures.

RHI procedures to cover the internal and external sharing of RHI data, principally to help improve industry competence and for anti fraud purposes

Author	Morag Drummond
Audience	RHI Operations
Date	27 December 2012

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1. Introduction

1.1. The RHI Operations team, through its accreditation processes, periodic data approvals and subsequent audits, gains information about the performance of RHI industry members, particularly RHI applicants and participants, installers, Independent Report on Metering Arrangement (IRMA) providers and manufacturers. Sharing information could help facilitate an improvement in the performance and consistency of these bodies and can add in a valuable anti fraud control.

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1.2. Where IRMAs are found to be sub-standard, in order to identify poor performers to the renewable heat industry the RHI Operations Team will alert the relevant training and assessment bodies, as well as the individual authors concerned.

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1.3. Where Ofgem finds errors in MCS certificates provided by RHI applicants these will be reported to Gemserv, who are responsible for the MCS, so they can take remedial action.

Comment [b1]: This is too soon – there are no appropriate bodies yet. Is it the first port of call? Shouldn't we be telling the IRMA provider and their client first? was thinking of something much more general than this at this stage

1.4. A list of the make, capacity and model of equipment which forms part of RHI accredited installations will be published on the RHI website. Certain boilers which have been identified as performing very badly will be reported to the relevant manufacturer.

Comment [b2]: What does this mean? What information will be shared, the na of the site, the name of the person who produced the certificate?

1.5. Where Ofgem finds evidence which it believes indicates a health and safety issue with a particular installation, this will be reported to the participant, the installer and the HSE to allow them to take any necessary action, as well as to any other relevant bodies.

Comment [b3]: This is not yet agreed and we need a full study of the amount of ti this will take. A small-scale trial of amassing this information should take place first.

1.6. There are a number of installations accredited to both the RO and the RHI. Sharing information internally between these two schemes will allow us to compare data to check it is being submitted consistently, and that Ofgem is acting consistently in its treatment of the installations.

Comment [b4]: Do we need to say something here about our ability to contact the installer?

1.7. In time other areas may be identified where it may be desirable to share information with other bodies in order to improve the quality of RHI applications and installations and reduce fraud.

1.8. This procedure describes how such information is to be shared.

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2. Overview/description of procedure

- 2.1. This procedure is designed to cover each, currently envisaged, scenario which could arise whilst dealing with RHI data where there would be justifiable benefits from sharing the data, both internally and externally.
- 2.2. This process should be used for each incidence of sharing RHI data.

3. Procedure details

IRMA Authors

- 3.1. The RHI Operations Team has put together an IRMA author watch list for providers whose reports have been found to be of a poor quality. This highlights IRMAs which cannot be 'relied upon'. However, given the lack of reliability with IRMAs generally, our procedures do not currently assume reliance on comments provided within any IRMA.
- 3.2. Adding an IRMA author to the watch list may be a trigger for site audit selection. In addition the watch list is consulted if, as part of an escalated review/topic specialist input, the opinion of the IRMA author is being taken into account. In these cases reliance on evidence from a report authored by someone on the Watch List is weighted appropriately.

3.3. In the future we expect that industry bodies who offer training and assessment of IRMA authors will be in place. At that point we intend to share information about the authors of any sub standard reports with them. This will allow them to either improve their training programmes and / or re assess the author concerned. *Link to be added to template industry body letter at that point*

3.4. When IRMA training and assessment is in place we intend to write to participants to inform them that they will need to provide an alternative report. We would copy the IRMA author into this report. *Link to be added to template participant letter at that point*

Installers

3.5. Where Ofgem finds errors or inconsistencies in MCS certificates provided by RHI applicants these will be reported to the MCS so the certification bodies can take remedial action. *Link to be added to template installer letter*

3.6. Where an installer does not belong to any supervisory body, for example for installations above 45kW, there is a requirement that the work be notified to the Local Authority Building Control officer. Where Ofgem discovers these instances it will notify the relevant Local Authority Building Control officer. *Link to be added to template Local Authority letter*

Manufacturers

3.7. The RHI Register contains the make, capacity and model of equipment which forms part of RHI accredited installations. The RHI Operations Team currently maintains a list of some of these, and will develop it into a full list. This list will be published on the RHI website to give a useful indicator that this equipment (when correctly installed) can form part of RHI accredited installations. The published list will be updated monthly with any changes. *Link to be added to make and model list*

3.8. The Team have also identified that certain boilers perform badly and this will be reported to the relevant manufacturer. *Link to be added to template manufacturer letter*

Comment [b5]: So should we be institut procedures for all IRMAs? This seems to beg several questions

Comment [b6]: I think we need to be explicit here about what we will share. Name of IRMA author, nature of discrepancy, where and when claiming to be trained, member of what body etc. There is also a question about the certainty that any discrepancy is due to error by the IRMA provider – do we need to have a first step of verifying the issue

Comment [b7]: Again I think it would be useful to be clear here about the central points to be made in this letter

Comment [b8]:

Comment [b9]: Errors likely to be in boiler sizing etc, we might need to include both the certificate and anything which contradicts it. So the issue here might be of sharing further third party information

Comment [b10]: I am not in favour of our taking responsibility for informing the LABC. Also, this is true for boilers, do other types of equipment count as 'controlled services'? It is in any event the owner's responsibility – we could make this responsibility clear to them and ask them for assurance that this has been done. The point is then that we should ensure that the installer knows that this has been picked up and is a failure of process.

Comment [b11]: Do you think we could make this less perjorative? It might be better to say something like 'Some boilers as installed, show aspects of sub-optimal performance. Where such performance issues are identified, steps will be taken to inform the manufacturers in order that they can address the issues whether caused by equipment or system design installation.'

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Health & Safety

3.9. In the course of RHI operational activity, particularly accreditation and undertaking site audits, Ofgem may identify potential health and safety risks or hazards with a particular installation. Where Ofgem finds evidence of a significant issue (ie, one with the potential to lead to a serious accident or ill-health) this will be reported to the participant, the installer and the HSE to allow them to take any necessary action. If the installer has a recognised accreditation or is a member of an industry body this may also be reported to the relevant body. *Link to be added to template health and safety letter*

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Internal

3.10. For installations accredited to both the RO and the RHI we will share information on particularly fuel measurement & sampling (FMS) and sustainability. This will include accreditation information, information contained in the FMS questionnaire, periodic data, audit outcomes and correspondence. Sharing information internally between these two schemes will allow us to compare data to check it is being submitted consistently by the participant and being treated consistently by Ofgem. *Link to be added to new RO / RHI data sharing procedure*

3.11. Our point of contact with the RO team is Amy Ling.

Comment [MD12]: tbc

3.12. Do we need something explicit here on the mechanisms for sharing information how it will be held, when it will be discarded, who will be responsible, what we will do if we find issues?

4. Areas of responsibility

4.1. All data sharing described in this procedure must comply with all applicable data protection and defamation laws. These include the Data Protection Act, section 105 of the Utilities Act 2000, and Article 8 of the European Convention on Human Rights.

4.2. In order to ensure continued compliance with the relevant legislation, and to guard against the risk of a challenge to any data sharing, staff must take great care to follow the procedures outlined in this document and to use the relevant template document when sharing data. To assist with this only the following trained staff can work on data sharing activities and this must be authorised by an RHI Senior Manager. This is to ensure that no one person is able to independently share data. *List of staff to be added*

Comment [b13]: Was the intention to be up this section on the further advice of legal?

5. Advice and Guidance

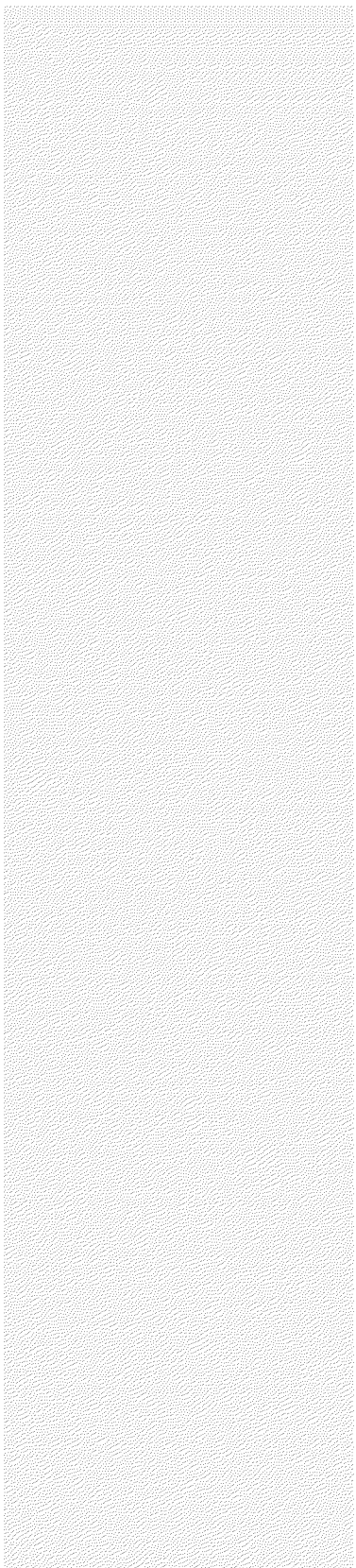
5.1. For any guidance on this document, please contact Morag Drummond. *More staff to be added*

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Appendix - Related policies and further information

Various templates to be added





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